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ABSTRACT

This report begins by considering the design of compensatory education evaluations. A professional evaluation of Elementary Secondary Education Act Title I must make a precise accounting of the relations among expenditures, implementation, outcome and impact; measure effectiveness over a long enough term to determine if the benefit and gain last; and explore alternatives to the assumptions on which the programs are based. The problems created by having to develop major evaluation studies quickly are examined. Conclusions about the way in which the National Institute of Education (NIE) handled these problems are reached: (1) The lack of time prevented NIE from securing the cooperation of a representative sample of school districts. (2) School districts should have been selected from demonstrations so that they would be representative of the nation. (3) All major contracts for program evaluation should have been competitively awarded. The report analyzes the original plan for the longitudinal evaluation of compensatory education by the Office of Education (OE). The scope of that study was being reduced to a half of its original scope when this report was being prepared. Although both the NIE and OE evaluations are supposed to assess the efficacy of compensatory education, neither study will do this. Problems in the coordination of the two studies are also discussed. (Author/JM)

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CAN WE AFFORD DEFICIENT EVALUATIONS?

An interim report by the

National Advisory Council on the Education of Disadvantaged Children

425 Thirteenth Street
Washington, D.C. 20004

January 23, 1976

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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January 23, 1976

Dear Sirs:

I am pleased to submit to you a special interim report of the National Advisory Council on the Education of Disadvantaged Children.

The Council is reporting on the evaluations launched in 1975, by both the DHEW Office of Education and the National Institute of Education. Both evaluations will examine the operation and effectiveness of programs which Local Educational Agencies (LEAs) carry out under Title I of the Elementary and Secondary Education Act, the Title providing for compensatory education assistance.

We sincerely hope that our views and recommendations will prove beneficial.

Respectfully submitted,

Owen F. Peagler
Chairman

The President
The White House

Honorable Nelson Rockefeller
President of the Senate

Honorable Carl Albert
Speaker of the House of Representatives

TABLE OF CONTENTS

Foreword i

Introduction 1

Part I The Studies' Background, Development, Initiation 4

Part II Comments Regarding the NIE "Research Plan: Compensatory Education Study," and the RFPs which flowed from it . . 10

Part III Description of the OE Research Plan for a Longitudinal Study 19

Part IV General Comments Regarding Efficacy. . 23

Part V Coordination 26

Conclusion 28

Appendix: Relevant Sections of P.L. 93-380, the Education Amendments of 1974 29

KEY RECOMMENDATIONS

That Congress and the Executive permit more time for such research to be well prepared 1, 15

That NIE and OE more closely coordinate 2

That the Executive exercise better coordination . . 1, 26-27

That exploration of alternatives be given more attention. 2-3, 8, 16

That the longitudinal study be an approach that becomes regular practice, even at state levels 2, 8

That the form of evaluations must test a program's basic assumptions. 7, 17

That the NIE surveys more adequately include the larger school systems 10-11, 15

That the NIE-sponsored demonstrations in altered fund allocation be better developed in order to <u>really</u> comprise concentration/dispersion variations 13-14

That sole source contracts be avoided 14-15

That the OE longitudinal survey thoroughly explore socio-cultural as well as economic factors 21-22

That the OE longitudinal study as now designed, flawed by its exclusion of youngsters who move, needs a better arrangement to bridge this problem 21

That the OE longitudinal study needs to be extended in time frame to assess the <u>lasting</u> impact of compensatory education . . 22, 25

FOREWORD

In 1973-74, the Elementary and Secondary Education Act (E.S.E.A.) underwent broad, detailed review by Congress. The result was Public Law 93-380, the Educational Amendments of 1974, enacted August 21, 1974.

Certain sections of PL 93-380 mandated that the National Institute of Education perform a major study of the operation and administration of Title I, E.S.E.A. compensatory education programs.

Section 821 of that Act also stipulated that the National Advisory Council on the Education of Disadvantaged Children (NACEDC) "shall advise the Institute with respect to the design and execution of such study."

The Office of Education also received a charge in this field. Section 417A of the E.S.E.A. Amendments of 1974 called upon the Commissioner of Education to present to Congress not later than November 1 of each year comprehensive evaluations and surveys relative to the Act. Section 151 of the Amendments also commissioned the Office of Education to undertake a broad Title I evaluation. The Commissioner of Education, it was stated, "shall provide for independent evaluations which describe and measure the impact of programs and projects under this Title," Title I.

This too became a subject within the advisory scope of the NACEDC not only because of the Council's broad enabling mandate but also because of the two studies' coincidental timing and common subject: a major Title I, E.S.E.A. evaluation.

INTRODUCTION

The report which follows presents a review and critique of the process, steps and arrangements involved in the now on-going major evaluations of compensatory education by two agencies linked to the Department of Health, Education and Welfare, the National Institute of Education and the Office of Education.

This is a case study of the birth, growth and problems in design of a major Federal evaluation.

The Elementary and Secondary Education Act is a decade old. Congress, in 1974, mandated a major evaluation of its Title I, by NIE, while adding language and emphasis to the on-going evaluation responsibilities of OE (see Appendix, herein).

The Legislative and Executive branches both face the difficult task of fine-tuning the administration of not just one but hundreds of social programs enacted within the past decade. This fine-tuning requires the strongest body of evidence and insight, making possible basic alterations and, when indicated, termination of programs. Evaluation as a process is growing in importance as more and more attention in domestic programming focuses upon assessing and improving results, especially cost-effectiveness.

The Council's report outlines weaknesses in the way these legislative and executive responsibilities now are being carried out with respect to one program's evaluation, but with implications "writ large" for the legislative and executive process as a whole. The lessons to be learned, we suggest, include these:

- That the Congressional practice of enacting much major legislation late in a fiscal year does special damage to research projects whose design and contracting then must be telescoped. A better effort must be made to accord research a realistic time frame.

- That Congress and the Administration need to provide improved oversight disciplining and coordinating separate agencies' tendencies to embark upon connected research without coordinating arrangements.

- That the practice of assuming that varied agencies concerned with a given problem naturally will coordinate

carries too far a naive faith in good administration. The Executive must examine the problem of coordination with more realism and commitment. Its coordination is now too often "after the fact", ritualized and weak.

- o Most important of all, in the design of evaluations, there must be a perception of the relationship of programs to problems that goes beyond mere measurement of a program while in progress. What lasting impact does it have? What is its relative value?

Thus, the issues are far broader that merely the obvious possibilities of overlapping objectives and of administrative shortcomings; the issues involved also include Congressional expectations (and timetables), inter-agency coordination, the role of Advisory Commissions and Councils.

The analysis which follows documents the need for modifications in the two programs of study (one by OE, the other by NIE) now underway examining the effectiveness of Title I, E.S.E.A.

The major points are:

- o *That between OE and NIE there be a common definition and standard of effectiveness of compensatory education programs, taking into consideration all the variables in a school district.*

- o *That between OE and NIE there be a common understanding regarding what the local education agencies (LEAs) should be expected to do and accomplish with <u>their</u> resources. For example, if reading and math have appropriate high priority in <u>basic</u> education, supported by state and local funds, then what is the rôle of compensatory education ?*

- o *That the OE study design in particular be revamped to provide for assessment over a sufficiently long interval - <u>several years longer than now planned</u> - to really test efficacy, lasting impact and effectiveness - assessing student performance some period after their Title I program exposure. Lasting impact is the best measure of value.*

- o *That longitudinal studies should, in fact, be regular practice in Title I and not a rare event. In fact, the technique is so valuable that it should be employed by states and at least the larger school districts, albeit with smaller samples and lower costs.*

- o *That both study designs, but especially the NIE design, must more actively explore alternatives instead of focusing (as they do now)*

largely upon the refinement of present arrangements centered around the school. What non-school processes would produce a better educational dividend for $300/student ?

A word about the Council's position. The studies involved now have begun -- that is, contracts have been let, and actual work under contract has started. Yet the Council has serious concerns regarding the design of the present evaluations. The NACEDC recommends that many of the questions raised should be taken into account by those directing and managing these studies as well as by higher officials who approved their activation and form. For money is too precious and time always too short to permit these deficiencies from happening or continuing.

PART I

THE STUDIES' BACKGROUND, DEVELOPMENT, INITIATION

Briefly tracing the anatomy of these studies helps provide perspective and also helps illuminate some of the problems involved in Title I,E.S.E.A. evaluations' design and implementation.

Compensatory education became a major piece of social legislation in 1965. In subsequent years, funding slowly expanded. So, too, did concern over effectiveness. In 1972, Congress responded to Administration suggestions for reform, and adopted the strategy of focusing available resources in those primary schools with substantial proportions of disadvantaged children. The Department of Health, Education and Welfare suggested that a $300/pupil target sum was a level of funding which the then-existing, and admittedly inconclusive research suggested as the "critical mass" of aid for compensatory education at which there was significant impact...the size, scope and quality to make a difference. Beyond this general funding level, it was suggested that any marginal benefit from added money per pupil was not cost-effective. Of the total resources available, now approximating $1.9 billion per year, over half is spent in emphasis upon the school years kindergarten through third grade. Almost all the resources are applied kindergarten through eighth grade.

Program Assumptions

One cannot evaluate a program independent of that program's context: the problem addressed, the assumptions made, and so forth. When a program is designed, the Executive, Congress and others involved make assumptions determining the basic form in which the program will be implemented, assumptions shaping how the funding will be determined and disbursed.

What are the basic assumptions behind compensatory education, principally Title I? While a full answer would require extensive summarization of legislative history and classroom practice over this decade, certain major assumptions are obvious, we believe, from the form in which implementation has taken place:

1. That the slower rate of learning on the part of children, when manifest, represents disadvantage on their part.

2. That the schools in which there are a preponderance of young people performing below norms have not tried all they can.

3. That the slower rate of learning on the part of educationally disadvantaged children represents a condition that school systems with focused, financial assistance could substantially overcome.

4. That a preponderant proportion of disadvantaged youngsters live in areas with lower financial resources. Disparities of both home and school have been interlocking. (The disparities are not all negative. In many ways disadvantaged children grow up learning special skills - e.g., survival skills - upon which schools need to capitalize.)

5. That the schools as a delivery system represent an appropriate and effective place in which to overcome the weak learning rate that tends to be common among the disadvantaged.

6. That the regular curriculum and school budget could not adequately provide for this problem in school areas where disadantage was prevalent. That a major solution to these special needs required special, concentrated, compensatory educational approaches backed by special federal funding but largely designed by educators at the local level.

7. That special federal funding would spur the development of new and innovative techniques to accomplish what conventional education had failed to accomplish. That local schools knew their youngsters' problems and needs best, and with extra money could institute advances to help them learn better.

8. That increased educational attainment would lead to increased employability and productive citizenship.

So came Title I, E.S.E.A., a decade ago.

It was one of the major products of the 1960's, that era of social ferment and wide-ranging initiative seeking remedies to the discontent and gaps between have's and have-not's in our society. From the Voting Rights Act to Head Start, the era sought to strengthen the performance of existing institutions, to bring the poor into the political process, and to remedy the causes of discontent including little dividend from conventional K-12 education, handicapping the disadvantaged in employment and socio-economic status.

Many of the social programs enacted in the 1960's mainly were "envelopes" for a federal investment in a problem area. In many respects this applies to Title I. Second, and with special relevance to Title I, even educators themselves always have lacked precise means for predicting what learning

dividend, if any, should flow from a given level of financial commitment. And probably for good reason: for to effect such predictability would require a centralization, standardization and even regimentation of education out of keeping and out of place in the American character and scene.

Evaluation is not a way out of the endless variety in effectiveness that local leadership produces, because that endless variety is essential in our System. In fact, differences in background and development undercut any assumption that educational attainment can comparably be assessed.

This makes national assessment of the operation of a program such as compensatory education very difficult and, more important, frought with the danger of producing findings homogenized into a misleading national set of statistics... averages and norms bearing little relevance to each particular case. The measurements applied have widely varying relevance notwithstanding the sincere efforts by program administrators to develop objective appraisal instruments ("culture-free tests", etc.).

We have similar reservations about the efficacy of evaluations of the administration of programs, the special emphasis of the NIE program of studies. Every evaluation of compensatory education to date has indicated that there have been insignificant or only slightly significant gains. There also has been difficulty in comparative measurement beyond the local level.

The compensatory education Title of the Elementary and Secondary Education Act in fact assumes this, by its basic feature of making available federal funds to local programs meeting certain guidelines criteria, but essentially local and therefore tending to always be unique in design and character.

What this suggests is that longitudinal studies assessing program efficacy (studies in which the educational level of a youngster according to some grade level criterion determined by the LEA is compared against the level of that same youngster last year or the year before) do make sense. Studies trying to discern best practices (by comparing progress across systems and between groups) are likely to be far less meaningful.

And yet, programs such as Title I cannot be presumed to work merely because their aims are desirable and we would like them to work. The entire public process should have an interest in making only the commitments in this broad field proven to produce lasting benefits, not temporarily "hypoed" change or a mere demonstration of societal concern. The problem of effectively helping the disadvantaged to succeed is too vitally important.

Within the limitations these thoughts suggest, there is enough evidence in existing research that educational funding level has little to do with achievement, to warrant thorough-going testing of basic program assumptions

behind Title I, E.S.E.A. Educational attainment is a function of socio-economic factors in which the school is part of a far larger complex set of influences in the background and environment of young people. Scholars in the field also remind us of the range of individual differences involved. In any school there tends to be a wide range of ability and learning, a point arguing for processes as individual as possible.

Clearly, this is a field in which there are serious limitations to the application of social sciences' current confidence that it can quantify meaningfully the measures of the effectiveness of a process which, when one analyzes it, one finds heavily dependent upon many personal, individual variables, the most basic of which in this case is the individual teacher.

The wide diversity -- in fact, polarization -- of views about how to improve the effectiveness of education of disadvantaged children certainly makes it clear that there can be no easy generalizations or conclusions... no clear quantification of data that supports any particular approach conclusively. The poor flow of information in the educational system (up and down) further undermines the value of a research product.

Requirements of Effective Evaluation

To evaluate means to test effectiveness and efficiency. The requirements of effective evaluation that are policy level rather than merely performance level are :

1. The evaluation must test the program's basic assumptions. No evaluation of a policy level order can be judged effective, unless constructed around a test of the assumptions behind the interventions a law mandates. It is the task of evaluation to test assumptions about what works and why. It should help identify correct assumptions. So, evaluation design must produce an organized analysis to produce the data from which can be extrapolated quantitative and qualitative insights, validating, refuting, or modifying the operative set of assumptions behind law and practice.

2. Evaluation must proceed from clear definition of the problem addressed and the program intervention made. Definition is vital. Lacking it, one cannot be certain that what is being measured is, in fact, the response to the original problem. It might merely be the program rationale which, like a protective coat, keeps many programs "warm" even after well-distancing original purposes.

One also cannot be sure, lacking clear definition, that the measurements which evalutation arrives at really relate to or provide relevant feedback in terms of Congressional intent, or represent significant insights.

3. Everyone who is key must want the evaluation and work at making it work, whether Congressional Committee(s), OMB, OE/HEW or NIE- and local level education administrators.

4. Regrettably, there can be no objective, meaningful evaluation of education cost effectiveness, because there is no accurately testable correlation between expenditures to produce the intervention and program implementation (clear, visible evidence of something like $300 in value showing up - value of services, that is), program outcome or performance and finally, program impact.

All are important. All have significance in this present context.

These are the problems of approach we believe must be taken into account in any professional, objective evaluation of Title I compensatory education. The Council maintains that in any professional evaluation of E.S.E.A. -

- o The evaluation must bring precision to the correlation between expenditures, implementation, outcome and impact which in well-administered programs should be on-going;

- o The best measurement of effectiveness is longitudinal - that is, over a long enough term to reflect adequately whether the benefit and gain last ;

- o To provide the most valid test of operative assumptions, the evaluation must openly explore and weigh alternatives. (For in the search for the best "fruit", it is not enough to merely compare apples).

The Advisory Council's Concerns Regarding the OE/NIE Studies

In December, 1974, NIE published its Research Plan for Compensatory Education; by March,1975, RFPs were being issued in a series now (as of December, 1975) nearly complete. The OE timetable was comparable.

On January 31, 1975 the Council reported to Congress and the Executive the various questions and reservations it had about the way in which the OE/NIE programs of study were taking shape.

In the fall of 1974, the National Advisory Council observed that OE and NIE were making ready research plans, that coordination was weak, and that the Council itself had been informed but was not being closely consulted. The agencies seemed to assume that their studies were so different in design that the value in inter-agency consultation was small.

The Council took the initiative to ask for close consultation. However, for many months the arrangements proved weak, usually consisting primarily of the agency advising the Council when it was about to take a course of action the agency had already decided upon.

At the same time the Council found in FICE and other bodies improved means of coordination and impact for its views:

- The Council's concern about coordination has resulted in the formation of an appropriate FICE working group; as one indication of progress in cooperation, this working group now has agreed to a sharing of instruments before going to forms-clearance stage, facilitating cooperation.

- There are now monthly meetings between OE and NIE staffs involved in these studies, with the NACEDC invited to be present.

PART II

COMMENTS REGARDING THE NIE
"RESEARCH PLAN : COMPENSATORY EDUCATION STUDY"
AND THE RFPs WHICH FLOWED FROM IT

Totally apart from questions of design, the mechanics of handling the initiation of wide-ranging major research within a very limited time frame clearly created problems for the agencies involved, especially NIE. For the NIE approach heavily depended upon gaining school district cooperation, a difficult matter. *A typical school district is asked to cooperate in some 50 surveys and studies annually by DHEW alone.*

District Selection

A word is in order about the way in which NIE developed its selection of districts to be involved in two of the major studies of its research program, for both processes appear weak.

For one major phase of its study, the demonstration projects, NIE sought nominations through the state Departments of Education -- an extended process which meant that the feedback formalizing a district's agreement to cooperate and participate may have taken longer than the time available. The willingness and ability to nominate, within a state, depended upon internal politics as well as ability to act in time. Houston got into the study because a Houston school official heard about it during meetings in Washington and successfully asked her state to process the nomination. New York, Chicago and Los Angeles also wanted to participate, according to NIE, but their states did not nominate them.

Total nominations were far below expectation. Out of 50 states that could have nominated two LEAs, only 27 districts were nominated, from which NIE then selected 16 proposals as the "best written". The result, we suspect, is that the districts in this phase of the study were not as representative as they should have been.

Another major phase of the study is District Survey I, a large survey of practices in compensatory education in 105 districts. This too has problems of representativeness. To draw this sample, NIE first divided the nation's 16,000 school districts in thirds by size. The 5,333 larger districts were then assumed to be large, the next third medium, and so forth.

NIE then proceeded to draw equal samples from each of these thirds, to comprise the final 105.

Because it has not been provided with the necessary information, (NIE is keeping confidential the list of the 105 districts involved in the interest of helping assure their cooperation), the Council does not know the degree to which the NIE-selected sample of districts is effectively representative. Nonetheless, merely on the basis of NIE's sampling method, we have a serious question. There is a major question as to the kind of representativeness that would have been best. NIE points out that its sampling technique sought to produce a sample representative of the nation's approximately 16,000 school districts; in this approach, the districts in the largest third by student size would comprise a third of the sample.

The Council advised NIE that far preferable would be sampling representative not of districts per se, but of student population and program cost. The very large districts do in fact have a proportion of the total Title I students that is far beyond their numbers as districts, and they have special administrative problems with their Title I programs also.

The point is not minor. NIE deemed that a district was large if it had over 18,000 students, as it turned out; the Council deems a large district to be more on the order of 100,000 students.

NIE Research Objectives

NIE's Research Plan: Compensatory Education Study (p.2) describes the objectives of the research in language which includes:

> This study's proper concern is with the adequacy of educational programs provided to students. It will examine programs and look for identifiable factors in funding, organization and instructional methods that explain success.

While we will deal later with the way NIE has assembled cooperating districts , it is worth noting here that identifying and explaining success (requiring focus on programs known as successful) probably would have led to an entirely different approach from that which NIE did in fact follow in asking state Departments of Education for nominations. For in the practice followed, cooperation tended to be the dominant key, not known success.

The NIE Plan warns of difficulties facing this research which are inherent in the educational field:

- o Lack of uniform standards of assessment; there are so many variables that no effort at uniformity could be fair.

- o Shortcomings of existing data; what data does exist on educational progress is sketchy and unreliable, there is no uniform testing, and NIE will not provide it. NIE warns of the difficulties facing their statutorily required research.

The NIE Plan recognizes that there is a great degree of local autonomy in development of the Title I E.S.E.A. program. Therefore NIE considers it important to examine, in a range of districts, what goals each local district has set for the Title I program (e.g., special emphasis on bi-lingual instruction in some areas), what relationship there is between these stated objectives and program approaches, techniques and implementation, and what procedures the school system employs to evaluate Title I success itself.

NIE's Analysis of Individualized Instruction

In NIE's study design, District Survey II will "study the effectiveness of individualized instruction in the teaching of reading and math."

Congress obviously is quite favorably impressed by the results and potential results in individualized written plans as the cornerstone of individualized instruction. In the 1974 education amendments to the E.S.E.A., in fact, section 141 of the law was amended to provide that "It is the intent of the Congress to encourage, where feasible, the development for each educationally deprived child...of an individualized written educational plan (maintained and periodically evaluated), agreed upon jointly by the local educational agency, a parent or guardian of the child, and when appropriate, the child."

We commend NIE for the extensive way in which it has been alert to this special Congressional interest and has mapped studies to examine this approach.

Individualized instruction obviously is not "one to one." Rather, says NIE, the key characteristic of individually tailored instruction is "student progress and remedial instruction which is based on student performance on the progress tests and allows students to proceed at their own rates." Standardized instruction has a class speed which represents a norm (with the brighter youngsters either given special assignments or becoming bored, and with the lagging youngsters getting only the

attention the teacher can spare). The individualized instruction of interest to NIE is to compare each student's skills (usually in reading and math) not against a class norm, but against a "standard instrument" which identifies deviations in learning rates, calling for individual learning plans which are then carried out to the ability of the teacher in that same class group.

NIE's contractor under this award will examine:

Instructional techniques

How compensatory education activities are coordinated with regular instruction (such coordination being assumed desirable). Is it separate and "remedial" ? Or is compensatory education more subliminal and system wide ?

What system (if any) of stated performance objectives does the district employ ?

The goals include determining the aspects of individualization that are most crucial, assessing methods for involving parents, determining conditions for successful implementation.

The contractor also is advised that NIE is not interested in the "unusual" classroom with pioneering work in it that too often depends upon the unusual teachers. (Although another section of the study, that which seeks innovative practices and programs, certainly will depend quite heavily upon finding the unusual classroom with pioneering work).

Examination of Allocation of Funds

Research on Allocation of Funds, the second major category of research, seeks to "determine the results of possible changes in federal regulations governing local school districts' management and delivery of compensatory education services under Title I."

Notwithstanding the research objective of testing both concentration and diffusion of available funding as deviations from present regulation-set practices, it is interesting to note that all 16 districts selected for this experiment-phase, NIE reports, have stated in their proposals that, if accepted and given freedom to deviate from normal HEW rules, they would disperse the funds far more (that is use the funds in a thinned out way to provide services to far more of the total number of disadvantaged students in the district).

This is a result whose meaning NIE should probe and not merely accept. Does it mean that the districts uniformly believe that the way to improve program effectiveness is through less expenditure per target pupil, spreading the program impact over more pupils? Or on the other hand, does it reflect local political and operational pressures to try to help as many youngsters as possible? Or neither, or both? Uniform as it is, the district response pattern certainly holds some significance, even as that pattern tends to vitiate the original intent that the demonstrations test both concentration and diffusion of funds from the present normal pattern.

Also, while the work-statement does not specifically call for it, we believe it important for effective cost-analysis that the study coordinator in each school be asked to identify all the major Title I, E.S.E.A. dollars which proportionately end up allocable and attributable to given compensatory programs, difficult as this will be because of co-mingling.

Other Costs of Note

In addition, NIE has granted another series of awards for supportive studies. Four awards are for studies of "Alternative Designs to Current Practice in Compensatory Education," a most desirable step. Others commission studies of program goals, operating characteristics and other matters.

We urge that in every study there be emphasis upon identifying keys to success. What works? Why? Another: that there not be examination of the school and of school programs in isolation, but inclusion of the community's educational impact and value. For if socio-economic factors now are a drag upon learning, should they not be a focus of research attention as much as is the classroom?

Sole Source

All of the main awards for research under this broad program were by competitive bid, except one.

One of the contracts NIE issued in this work-program was on a sole source basis to the Lawyers Committee for Civil Rights Under Law. This organization periodically engages in

litigation against various agencies such as state education departments and school districts. Their contract is for research into state-by-state legal standards in the administration of compensatory education.

One must question this arrangement. By the award, NIE has inhibited an advocacy group. One also must question the basic conflict in the contractor's action accepting such an award, with its stipulations against use of the research findings in actions against units of government when such legal action is the Committee's frequent practice.

Certainly the agency's justification for making this award sole-source, uncompetitively, should be public. The Council has been provided with a copy; the Council remains concerned about the propriety.

Summary Observations

Our main conclusions about NIE's procedures in initiating these studies are:

- That the quality of the study program has been reduced as the result of the short time frame available to engender school district responses and cooperation that need to be representative.

- That with the demonstrations there should have been a more deliberate effort to select districts in a manner producing representativeness, rather than relying upon self-selection or state selection with consequent bias.

- That all major contracts should have been competitively awarded, on elements of a matter as emotionally charged and complex as compensatory education's evaluation.

These shortcomings certainly are not all attributable to NIE; Congress, after all, was a major factor in the tight timetable and extensive evaluation scope. Nevertheless, the problems point to the need for improved research management across the board, from the legislative to the action stages.

One must keep in mind a healthy skepticism as to whether the answer lies in programs at all.

When the District I survey instruments take final form, we urge NIE to make certain that those instruments cover what have been suggested elsewhere as factors in the delivery of improved learning rates among the disadvantaged:

class size (smaller the better)
school size (small also is better)
teacher experience
teacher ability and preparation
family/neighborhood cultural variables
year 'round influence
continuity year to year through school
citizens' involvement and responsibility
(How the educational system involves parents, and how the parents perceive themselves as having role and responsibility)

What about selecting schools in differing types of neighborhoods so as to allow and control for the non-school environments?

To the extent that NIE and OE studies do not define and examine true alternatives it becomes very important for the literature search to discover as much in the way of imaginative experimentation as can be found and described.

Other Comments

The background literature and analysis seem to pass over certain other major issues:

1. How to assess supplantation, if any. (Queried about this, NIE said that this only could be discerned through audit arrangements, but if so why not seek that audit with 3-4 cooperating districts to test whether this appears to be a problem worthy of more attention later?) The Council recommends that the new Title I regulations must define supplantation clearly. DHEW issued these regulations in draft form, for comment, March 11, 1975. It is highly regrettable that DHEW still has not finalized these important guidelines.

2. *What can be done to compare progress by students*

given compensatory education and groups of similar backgrounds not given such special aid? This is critical to the underlying assumptions of Title I.

3. There should be a clear direction to the contractors examining Title I programs (especially under Survey I) to develop data comparing the level of education, experience and skill of teachers working with disadvantaged children vs. children of more affluent backgrounds in the same systems, frequency of substitutes, and other such data to assess what the school system "normally" makes available per disadvantaged youngster vs. other children.

4. Is the compensatory education special aid being un-done and negated by other activities and practices within the school system?

5. How can there be aggresive exploration of non-school alternatives?

6. The study must also require attention to the issue of scale -- and by this we do not mean the size of the classroom. To what degree have schools at the elementary level become larger and better or worse? Is there a correlation between institutional scale and quality in compensatory education? Is there a correlation between scale and pyramided overhead?

7. In fact, what does the compensatory education dollar buy in various systems?

8. The Hawthorne effect: it is disturbing that the evaluation approach starts from a zero data base and will rely upon a future two year study of select districts starting data collection <u>after</u> the districts have learned that they are <u>select</u>. What allowances and corrective can there be for this?

9. Congress' expectation is the the NIE study results be available to guide consideration of new legislation as of September, 1977, may, although necessary, be too optimistic.

Beyond these issues of project administration there lies a larger question. The larger significance of evaluation lies in assessing the efficacy of doing anything at all. In this light, we believe that study of the <u>effectiveness</u> of compensatory education

over a long term is more valuable as a measure of program efficacy than the statutorily required NIE studies of program administration and of the factors behind apparent variance in school district success with compensatory education. And this longer term assessment of efficacy is the task of the second major evaluation program, that of the Office of Education (OE).

PART III

THE OFFICE OF EDUCATION
RESEARCH PLAN FOR LONGITUDINAL STUDY

The Office of Education also is embarking upon an ambitious research agenda and plan, to examine the effectiveness of compensatory education longitudinally: over years. OE's contractor will "track" the educational progress of a large number of disadvantaged young people over five years, with a sixth year a possibility.

While scope of the original study design now is being halved, as the result of Congressional concern for its cost, our analysis is based upon the original plan since as of this date the design of the reduced study has not been finally determined, OE advises, let alone communicated to us.

Instruments and Approach

As originally contemplated, the longitudinal approach would start with the development of a sample comprised of some 5,000 disadvantaged young people now enrolled in early primary grades. The contractor then would follow the progress of these individuals, developing a comprehensive data base about their educational exposure and success.

The sample will not be limited to students receiving special compensatory education that is federally financed. In fact, the number of individuals in the sample will be of sufficient magnitude to permit the cross-comparisons NIE will not be able to produce, among and between those in varying basic situations vis a vis compensatory education:

> Students whose education has been financed through Title I funds only;
>
> Students whose cost-of-education involves not only Title I but state and local funds as well, altogether;
>
> Students who, although disadvantaged, are in schools and programs that only involve state and local funding;
>
> Students receiving no formal compensatory program.

It is helpful to summarize the main tasks of the OE study:

1. From a national sample of 5,000 schools, get 400 to agree to participate. Load this sample of schools with an extra proportion of inner-city schools to compensate for the fact that, historically, these schools will be low in their response to a request that they participate.

2. Develop a battery of data collection instruments on matters including: student background, student condition and health, student attendance and program participation. Modify existing or new instruments to free them of biases as much as possible.

3. Field-test procedures in some 20 schools.

4. Train local coordinators, including training them in test administration and survey management.

5. Make cost effectiveness studies of various approaches.

6. Make a participation substudy.

7. Identify program successes and failures.

8. Develop detailed specifications of study issues. Develop detailed data collection and management plan.

9. Monitor and manage the on-going activities.

10. Prepare reports and other study products.

The Council's Reactions to the OE Research Plan

Our comments regarding this study plan are limited by two factors. The study's final form and duration are uncertain. And we have not yet received for review a copy of the contract involved, which presumably will be different and more detailed than the Request for Proposal (RFP).

With these caveats, our review has found the OE approach essentially sound. However we do have several reservations which even at this date involve points of approach and of methodology which can be improved:

1. The home survey is all-important and must be given special attention by the contractor. The home survey, in fact, should reveal far more about readiness to learn and ability to learn, than will be derived from observing and assessing the individual students in the school.

As now articulated, the home survey appears to ask the contractor to emphasize assessing economic status of the family. This is far too narrow an aperture through which to see and assess factors relevant to learning. The OE Work Statement does recognize the socio-cultural factors; what we ask isthat there be emphasis upon analyzing them. There is some correlation between poverty and a poverty of educational interest, but by no means a direct and dependable one.

2. By now, government should be well-tuned to the importance of drawing survey instruments broadly assessing the socio-cultural environment and context, in evaluations assessing the impact and efficacy of institutional intervention. As one example, we point to the on-going longitudinal study OEO started 5-6 years ago, "tracking" the status of some 5,000 poor and near-poor families (a study continuing under DHEW auspices). One criticism of this study's design has been its underanalysis of the socio-cultural factors in economic success and failure.

We urge strong focus, in this new OE study of 5,000 disadvantaged youngsters, upon development of comprehensive information about the socio-cultural background of the 5,000 families from which these 5,000 young people come. For *if the study does not "control" for the non-school environment, there is no way the study can assess school program effectiveness (a point with equal application to the NIE research plan reviewed earlier).*

3. We believe that the OE work statement tends to under-recognize the problems that arise due to the frequency with which family moves uproot families from neighborhood and school. The annual rate of moving in our society averages one family in seven. Cumulatively, this then is a major problem in any 5-6 year longevity study.

It is one thing to maintain sample size by substituting other young people for those who move (which OE asks its contractor to do); it is something else to maintain sample representativeness. After all, it is logical to project that over 5-6 years

a large proportion of the original sample will have moved. Besides, is the sample really representative if the contractor always is removing from it the students who move, whose experience of educational discontinuity is an important part of the real world (and probably an important factor in lagging learning rates)?

4. The contractor is asked to keep a log of each student's relevant educational experience and participation. Fine. This log should encompass all school activities, however, not merely the student's exposure to compensatory approaches and systems. For of what value is it to record and analyze the effect of a "supplement" without recording and analyzing as well the student's basic educational "diet" to which it is a supplement? Of particular importance, we suggest, would be a base-mapping of the student's linkages and peer group. To what extent can such networks be mapped as a step toward assessing whether the school peocess is in fact reaching and turning-on the youngster by reaching the value base on which his premises for action (e.g., his interest in education) rest?

We also believe that the OE study must be of a duration longer than the 5-6 years now envisioned. Our reasons are significant enough to be set forth under separate heading, dealing with the issue of Efficacy.

PART IV

GENERAL COMMENTS REGARDING EFFICACY

Any major evaluation of a public program and policy must address issues at two levels:

Questions of technique, and

Questions of efficacy.

Both the NIE and the OE evaluations seek to assess effectiveness. Neither study will do this. Both focus upon performance under present conditions only. Effectiveness has yet to be well defined.

No norm or standard is provided; in fact, a major objective in both research programs is examining present performance under present conditions -- with NIE focusing upon institutional performance and with OE focusing upon achievement gain by the individual.

When effectiveness is measured, as well as the standard by which it is measured, constitutes a critical issue. It is our opinion that a major difficulty if not weakness in these NIE and OE efforts to evaluate Title I, E.S.E.A., is their expectation that effectiveness can be measured in terms of improved rate of advance at the time: that is, improvement in cognitive skills during the special, augmented education Title I makes possible.

The Congressional mandate for the NIE studies specifically asks for assessment of effectiveness. We prefer to interpret effectiveness as carrying strong implications of a change that endures: that is, a change for the better in the level of cognitive skill, knowledge and interest which Title I students carry from school into adult life.

The experience of the adult remedial education programs embodied in such activities as those of the National Alliance of Businessmen (NAB) provides a relevant example. When NAB started sponsoring in-plant worker remedial education in 1968, many of the illiterates and near-illiterates they enrolled were people whose childhood educations once carried them well into high school and even college. In fact, the pioneering Texas program on whose

experience much of the NAB program was based involved some 80 workers testing at below fifth grade level. Of this group, a third were high school educated; five even had been to college (but lacked degrees).

A major educational problem which schools alone probably can do little to overcome is the effect of a life-style in which one's work does not require extensive verbal and mathematical skills, coupled with the electronic age in which there usually is small reliance upon newspapers and books. In other words, what the schools have to contend with is a life-style in which the paraphernalia and reinforcements that maintain educational competency through daily experience are, for many, weak or non-existant.

An examination of effectiveness only can be undertaken over a span of time, that is, longitudinally, and with well-constructed control for all other variables, especially cultural, social and economic. Examining shorter term manifestations of effectiveness runs the great risk of being misled by transitory changes soon overwhelmed by the other and more influencial factors which the school program does not substantially impact upon, let alone control, especially home and environment.

Of course, if such an erosion of advantage would be discovered (and there is enough evidence of the probability in the Head Start experience alone to justify looking into it), this would not imply fault in the process of education as much as the danger in expecting education alone to overcome the negative factors and influences schools themselves cannot control or offset.

The implications of these comments, for both the NIE and OE study designs, really run in two directions. We see nothing in the NIE design which really assess efficacy in the long range manner we believe essential. It is much more a study in the effectiveness of process than of program effectiveness. The OE study design will collect data for three years on a sample of youngsters now in the first six grades (thus, for those in the sixth grade the first year of the study, following them through the eighth). OE suggests as an option to be determined later, that of following classes through the ninth grade as well, in a fourth and fifth year of the study. <u>This and more should be done.</u>

Significance re: OE Study

We suggest that it should be possible to extend the study frame, without added expense, by rearranging the sample. For example, it probably is of little value to measure the attainment in the study's third year, of youngsters in the first grade who will not be assessed again thereafter; why not shift this commitment of funds into more focus upon measurement of achievment levels at higher years (comparing Title I eligibles who have been recepients of Title I special attention and Title I eligibles who have not)?

Even while exploring all such possibilities for lengthening the years studied by OE, we also suggest two other steps that might well telescope the activity, bringing savings that make extension possible:

1. Studying compensatory education levels every other year, deriving the inbetween achievement level through extrapolation.

2. "Mining" existing records (e.g., as NIE is endeavoring to do with the Rhode Island records that reportedly show achievement levels for the past ten years.

PART V

COORDINATION

Question has been raised as to the overlap, if any, between NIE and OE plans to analyze and evaluate the effectiveness of Title I compensatory education approaches.

In this regard, both studies aim at analyzing the fundamental purposes and effectiveness of compensatory education approaches and programs, and therefore they should have significant cross-overs. Regrettably, in our judgement, they have been avoided by the agencies.

Comments Regarding Coordination

The focus of coordination between the agency staffs concerned for these two studies seems to be at the procedural level, and even that must be adjudged weak. While the two staffs make sure they literally do not get in each other's way, coordination of a positive sort seems of a low order. Example: For months, OE did not receive copies of the NIE RFPs-and apparently did not feel the need to even ask for them until a periodic review session September 4th surfaced the point.

In addition, we question the decision by the NIE-OE project managers to deliberately avoid including any of the same cities in their studies, *in the interest of minimizing the burden on cooperating school systems;* yet in combination these two studies, while especially involved, represent but a small part of the annual burden of studies and reporting in school districts most of which is mandated in order to receive funds. It would seem that there should have been a deliberate effort to build bridges and crossovers between the data sets these two studies will present.

The need for improved coordination actually goes all the way back in the anatomy of these two studies, to the fact that NIE and OE report to different sub-committees in the House of Representatives.

The Council also is concerned about another weakness in coordination and contact which our study has revealed: there appears to be a tendency among those commissioned to evaluate a program, to do so with minimal contact with the program's administrators. It appears that NIE has not made sufficient effort to extract insights and information, if not also data, from the records and

depth of staff insight to be found in the DHEW office administering Title I, E.S.E.A. That office has ten years' background in this program. While independent evaluation has the advantages of fresh insights and objectivity, it still makes sense to glean as much as possible from the older, established center of expertise about the Title I program.

The Council recommends that especially at this late date, the compensatory education program administrators in DHEW be deeply involved in advising the OE and NIE Title I evaluations.

CONCLUSION

EVALUATION is an essential element of the effective and sustained upgrading of program performance.

The practice of it, however, requires great care. As we have tried to point out here, out of the OE and NIE efforts to mount major evaluations of Title I, E.S.E.A. the government can learn some valuable operational lessons for this and other occasions: the need to plan well allowing ample time to carry out the plan well; the need to coordinate, the need to derive maximum value from existing sources and records, the need to insist on representativeness, the need to structure the evaluation so that it really measures lasting impact, the need to imaginatively consider alternatives, and the need to truly welcome and involve public participation.

This is what good government is all about.

APPENDIX

PERTINENT EXCERPTS FROM P.L. 93-380

EDUCATION AMENDMENTS OF 1974

"PROGRAM EVALUATION

"SEC. 151. (a) The Commissioner shall provide for independent evaluations which describe and measure the impact of programs and projects assisted under this title. Such evaluations may be provided by contract or other arrangements, and all such evaluations shall be made by competent and independent persons, and shall include, whenever possible, opinions obtained from program or project participants about the strengths and weaknesses of such programs or projects.

"(b) The Commissioner shall develop and publish standards for evaluation of program or project effectiveness in achieving the objectives of this title.

"(c) The Commissioner shall, where appropriate, consult with State agencies in order to provide for jointly sponsored objective evaluation studies of programs and projects assisted under this title within a State.

"(d) The Commissioner shall provide to State educational agencies, models for evaluations of all programs conducted under this title, for their use in carrying out their functions under section 143(a), which shall include uniform procedures and criteria to be utilized by local educational agencies, as well as by the State agency in the evaluation of such programs.

"(e) The Commissioner shall provide such technical and other assistance as may be necessary to State educational agencies to enable them to assist local educational agencies in the development and application of a systematic evaluation of programs in accordance with the models developed by the Commissioner.

"(f) The models developed by the Commissioner shall specify objective criteria which shall be utilized in the evaluation of all programs and shall outline techniques (such as longitudinal studies of children involved in such programs) and methodology (such as the use of tests which yield comparable results) for producing data which are comparable on a statewide and nationwide basis.

"(g) The Commissioner shall make a report to the respective committees of the Congress having legislative jurisdiction over programs authorized by this title and the respective Committees on Appropriations concerning his progress in carrying out this section not later than January 31, 1975, and thereafter he shall report to such committees no later than January 31 of each calendar year the results of the evaluations of programs and projects required under this section, which shall be comprehensive and detailed, as up-to-date as possible, and based to the maximum extent possible on objective measurements, together with any other related findings and evaluations, and his recommendations with respect to legislation.

"(h) The Commissioner shall also develop a system for the gathering and dissemination of results of evaluations and for the identification of exemplary programs and projects, or of particularly effective elements of programs and projects, and for the dissemination of information concerning such programs and projects or such elements thereof to State and local educational agencies responsible for the design and conduct of programs and projects under this title, and to the education profession and the general public.

"ANNUAL EVALUATION REPORTS

"SEC. 417. (a)(1) Not later than November 1 of each year, the Secretary shall transmit to the Committee on Education and Labor of the House of Representatives and the Committee on Labor and Public Welfare of the Senate an annual evaluation report which evaluates the effectiveness of applicable programs in achieving their legislated purposes together with recommendations relating to such programs for the improvement of such programs which will result in greater effectiveness in achieving such purposes. In the case of any evaluation report evaluating specific programs and projects, such report shall—

"(A) set forth goals and specific objectives in qualitative and quantitative terms for all programs and projects assisted under the applicable program concerned and relate those goals and objectives to the purposes of such program;

"(B) contain information on the progress being made during the previous fiscal year toward the achievement of such goals and objectives;

"(C) describe the cost and benefits of the applicable program being evaluated during the previous fiscal year and identify which sectors of the public receive the benefits of such program and bear the costs of such program;

"(D) contain plans for implementing corrective action and recommendations for new or amended legislation where warranted;

"(E) contain a listing identifying the principal analyses and studies supporting the major conclusions and recommendations in the report; and

"(F) be prepared in concise summary form with necessary detailed data and appendices.

"(2) In the case of programs and projects assisted under title I of the Elementary and Secondary Education Act of 1965, the report under this subsection shall include a survey of how many of the children counted under section 103(c) of such Act participate in such programs and projects, and how many of such children do not, and a survey of how many educationally disadvantaged children participate in such programs and projects, and how many educationally disadvantaged children do not. For purposes of the preceding sentence, the term 'educationally disadvantaged children' refers to children who are achieving one or more years behind the achievement expected at the appropriate grade level for such children.

"(b) Each evaluation report submitted pursuant to subsection (a) shall contain: (1) a brief description of each contract or grant for evaluation of any program (whether or not such contract or grant was made under section 416) any part of the performance of which occurred during the preceding year, (2) the name of the firm or individual who is to carry out the evaluation, and (3) the amount to be paid under the contract or grant.

STUDY OF PURPOSES AND EFFECTIVENESS OF COMPENSATORY EDUCATION PROGRAMS

SEC. 821. (a) In addition to the other authorities, responsibilities and duties conferred upon the National Institute of Education (hereinafter referred to as the "Institute") by section 405 of the General Education Provisions Act and notwithstanding the second sentence of subsection (b)(1) of such section 405, the Institute shall undertake a thorough evaluation and study of compensatory education programs,

including such programs conducted by States and such programs conducted under title I of the Elementary and Secondary Education Act of 1965. Such study shall include—

(1) an examination of the fundamental purposes of such programs, and the effectiveness of such programs in attaining such purposes;

(2) an analysis of means to identify accurately the children who have the greatest need for such programs, in keeping with the fundamental purposes thereof;

(3) an analysis of the effectiveness of methods and procedures for meeting the educational needs of children, including the use of individualized written educational plans for children, and programs for training the teachers of children;

(4) an exploration of alternative methods, including the use of procedures to assess educational disadvantage, for distributing funds under such programs to States, to State educational agencies, and to local educational agencies in an equitable and efficient manner, which will accurately reflect current conditions and insure that such funds reach the areas of greatest current need and are effectively used for such areas;

(5) not more than 20 experimental programs, which shall be reasonably geographically representative, to be administered by the Institute, in cases where the Institute determines that such experimental programs are necessary to carry out the purposes of clauses (1) through (4), and the Commissioner of Education is authorized, notwithstanding any provision of title I of the Elementary and Secondary Education Act of 1965, at the request of the Institute, to approve the use of grants which educational agencies are eligible to receive under such title I (in cases where the agency eligible for such grant agrees to such use) in order to carry out such experimental programs; and

(6) findings and recommendations, including recommendations for changes in such title I or for new legislation, with respect to the matters studied under clauses (1) through (5).

(b) The National Advisory Council on the Education of Disadvantaged Children shall advise the Institute with respect to the design and execution of such study. The Commissioner of Education shall obtain and transmit to the Institute such information as it shall request with respect to programs carried on under title I of the Act.

(c) The Institute shall make an interim report to the President and to the Congress not later than December 31, 1976, and shall make a final report thereto no later than nine months after the date of submission of such interim report, on the result of its study conducted under this section. Any other provision of law, rule, or regulation to the contrary notwithstanding, such reports shall not be submitted to any review outside of the Institute before their transmittal to the Congress, but the President and the Commissioner of Education may make to the Congress such recommendations with respect to the contents of the reports as each may deem appropriate.